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Before the  
Federal Communications Commission  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

In the matter of	)	FCC 04-03
	)	
Second Further Notice of Proposed Rulemaking	)	WT Docket No. 00-48
	)	RM-9499
Amendment of the Commission's Rules Concerning	)	PR Docket 92-257
Maritime Communications	)	7 June 2004

**COMMENTS OF THE NATIONAL GMDSS TASK FORCE**

The National Implementation Task Force for the Global Maritime Distress and Safety System (GMDSS) supplements government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broadbased including over 1500 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at [www.navcen.uscg.gov/marcomms](http://www.navcen.uscg.gov/marcomms) which contains numerous GMDSS Information Bulletins, records of Task Force meetings, various letters and petitions seeking regulatory action, and comments to pending regulatory proceedings.

The Task Force desires to comment on the Commission's question as to whether to revise the requirements for DSC equipment to comport with international standards that were adopted after comments were last requested on this issue. The Task Force agrees that recent updates to the DSC standards completed by the International Maritime

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Organization (IMO), the International Electrotechnical Commission (IEC), and the International Telecommunications Union (ITU) should be incorporated. More specifically, the Task Force has previously supported and continues to support the International Class D standard for VHF-DSC as opposed to the minimal specification in the Commission's Rules recommended by the RTCM Special Committee 101. Task Force members have found early models of the SC-101 radios adequate for the distress function but clumsy and not user friendly for other DSC functions. The availability of a second receiver is also considered a significant advantage of the International Class D specification but there would be no objection to meeting the standards of maintaining the watch on channel 70 while working on another channel without dual receivers if that proves to be technically feasible

The Task Force also wishes to support inclusion of the Inmarsat F-77 ship earth station in the list of ship earth stations authorized to be used in lieu of a single sideband radio by vessels traveling more than 100 miles offshore. The Task Force has no objection to certifying other mobile satellite systems that meet applicable requirements noting that, at present, this might need to be limited to domestic voyages.

The Task Force fully supports the recommendation of the National Transportation Safety Board (NTSB) that all small passenger vessels should be required to have a reserve power source so as to be able to sustain emergency communications if main power fails. The cost of providing reserve power is considered acceptable in view of the safety benefit. The Task Force has no comments on the other issues raised regarding reserve

power on small passenger vessels.

With respect to the question as to whether commercial radio operator licenses and permits should be valid for life, the Task Force reluctantly supports lifetime validation. If the licensing system provided for an assessment of competency on renewal, the Task Force would likely support that option in the interest of better qualified operators. Under the circumstances, however, license renewals are more about collecting fees than establishing competence. The Task Force recommends that this new policy also apply to existing license and permit holders.

With respect to the question of providing greater flexibility in the examination process, The Task Force recommends maintaining a uniform standard with respect to the number of questions to be included on each examination, but recommends a grace period of six months after introducing a new question pool during which either question pool could be used to allow training institutions and candidates to adjust to the new pool.

The Task Force strongly advocates prompt action to ensure that technical provisions have been made for the early implementation of the new Ship Security Alert System (SSAS). The early July 2004 compliance date set by the International Maritime Organization is noted as is the recent work of RTCM Special Committee 110 to develop recommended standards for the modified COSPAS-SARSAT EPIRB to satisfy SSAS requirements. It would be especially helpful to vessel operators if the RTCM recommendations could be accepted as interim guidance pending completion of the FCC's Rulemaking. The

Commission should also take prompt action to authorize use of Inmarsat-D Plus in the U.S. since that system is also a candidate to satisfy SSAS requirements.

The recent FCC action to authorize low power use of VHF channels 75 and 76 should also be incorporated in other appropriate sections of Part 80.

For the National GMDSS Implementation Task Force

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